



Federal Communications Commission  
Washington, D.C. 20554

August 5, 2013

ACCEPTED/FILED

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Federal Communications Commission  
Office of the Secretary

John E. Deasy, Ph.D.  
Superintendent of Schools  
Los Angeles Unified School District  
Administrative Office  
333 South Beaudry Avenue, 24<sup>th</sup> Floor  
Los Angeles, CA 90017

ET Docket No. 13-84

Dear Dr. Deasy:

Thank you for your letter dated May 13, 2013, to former Chairman Genachowski on the subject of radiofrequency ("RF") exposure limits. You requested that "the FCC [] thoroughly evaluate the body of scientific studies which address non-thermal effects and establish an appropriate exposure standard for children."

The Commission shares the concerns of parents and teachers that Federal regulations protect the health of the public with respect to exposure to RF emissions in all locations, including classrooms. The policy of the FCC with respect to environmental RF emissions was developed to ensure that FCC-regulated transmitters do not expose the public or workers to levels of RF energy that are considered by organizations expert on human health and safety to be potentially harmful. Since the FCC is not a health and safety agency itself, we must defer to other organizations and agencies with respect to interpreting the biological research necessary to assess the health impact of RF emissions, and to determine what levels are safe. In 1996, the Commission adopted its current guidelines for human exposure to RF energy based on recommendations from the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), and other federal health and safety agencies. These recommendations were derived from guidelines issued in the United States by the Institute of Electrical and Electronics Engineers, Inc. (IEEE), and the National Council on Radiation Protection and Measurements (NCRP). The IEEE and NCRP had commissioned highly experienced and knowledgeable scientists and engineers to evaluate published scientific studies, including studies of the health status of persons exposed to RF radiation, to establish safe levels for human exposure to RF energy.

While the expert U.S. and international organizations continue to expressly find no established link between RF exposure and adverse health effects, we recognize that it has been many years since we conducted a formal review of our RF exposure limits and implementation practices. As you mention in your letter, the Commission recently opened a formal *Notice of Inquiry (Inquiry)* into whether recent research, standards setting activities and usage patterns of RF emitters of all types warrant a reexamination of the FCC's exposure limits for all regulated sources of RF emissions.<sup>1</sup> In our *Inquiry*, we specifically solicit input from federal health and safety agencies and institutes on this issue.

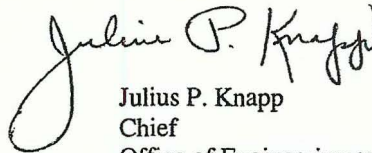
With respect to the engineering task of determining potential RF exposure levels in individual circumstances, we suggest accessing our Office of Engineering and Technology (OET)

<sup>1</sup> See: [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-13-39A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-13-39A1.pdf) The Inquiry begins at paragraph 205.

Bulletin No. 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* available at: <http://www.fcc.gov/encyclopedia/oet-bulletins-line#65>. The far-field exposure level or power density from wireless devices (including access points) are commonly estimated from equation (3) on page 19 of OET Bulletin No. 65.

We appreciate your interest and efforts with respect to this important matter, and your letter will be added to the record in the proceeding of our *Inquiry* (ET Docket No. 13-84). In addition, you are encouraged to add any comments, and particularly any authoritative scientific information, directly into the record using the Commission's Electronic Comment Filing System (ECFS). To submit comments, go to <http://apps.fcc.gov/ecfs/upload/> and type in the proceeding (docket) number (13-84), as well as contact information and associated filing details. The standard file formats for submitting filings to ECFS are Word, PDF, or Excel files. If there are any questions about this system, please feel free to contact our ECFS Help Desk: Phone: 202-418-0193; Email: [ecfshelp@fcc.gov](mailto:ecfshelp@fcc.gov).

Sincerely,

A handwritten signature in dark ink, appearing to read "Julius P. Knapp". The signature is fluid and cursive, with the first name "Julius" being the most prominent part.

Julius P. Knapp  
Chief  
Office of Engineering and Technology